

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JPMORGAN CHASE BANK,)	
NATIONAL ASSOCIATION,)	Case No. 1:23-cv-01112
)	
Plaintiff,)	Hon. District Judge Robert J. Jonker
)	
v.)	
)	
JOHN W. HIGGINS,)	
MARTHA R. HIGGINS; and the)	
UNITED STATES OF AMERICA,)	
)	
Defendants.)	
)	
UNITED STATES OF AMERICA,)	
)	
Counterclaim/Crossclaim Plaintiff,)	
)	
v.)	
)	
JOHN W. HIGGINS,)	
MARTHA R. HIGGINS;)	
)	
Crossclaim Defendants,)	
)	
And)	
)	
JPMORGAN CHASE BANK, N.A.,)	
)	
Counterclaim Defendant.)	

**UNITED STATES' NOTICE OF NON-OPPOSITION TO JPMORGAN CHASE BANK'S
MOTION PURSUANT TO FRCP 12(c) FOR PARTIAL JUDGMENT ON THE
PLEADINGS AS TO COUNT I OF ITS SECOND AMENDED COMPLAINT AGAINST
DEFENDANT HIGGINSES FOR JUDICIAL FORECLOSURE (LIMITED TO LOT 18)**

The United States provides this notice of non-opposition in place of a response to JPMorgan Chase Bank, N.A.'s motion for partial judgment on the pleadings as to Count I of its Second Amended Complaint. Chase's Count I and the motion seek judgment with regard to Chase's claim seeking foreclosure of its mortgage only as to Lot 18. Therefore, the United States

does not oppose the motion for partial judgment, while preserving its interest and assertion of superior claim in joined Lot 203 of the property at issue. In addition, the United States does not understand the bank's motion to be asking for a Sheriff's sale or as suggesting any opposition to the United States's counterclaim to seek a receiver's sale to maximize recovery.

DAVID A. HUBBERT
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/s/ Sarah Stoner
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